

EXHIBIT 3

Bolger, Kate

From: Steven S. Biss <stevenbiss@earthlink.net>
Sent: Friday, April 30, 2021 4:15 PM
To: Bolger, Kate
Subject: Re: Flynn - CNN

[EXTERNAL]

Kate,

My email below tells you exactly what my clients are going to do, and yet you persist with threats and attempts to intimidate.

I expect to file the Amended Complaint within a week. I agree that CNN is only required to respond to the Amended Complaint, and that CNN's responsive pleadings are due within 21 days of service of the Amended Complaint on CNN.

Call or email me if you have any questions.

From: Bolger, Kate
Sent: Friday, April 30, 2021 3:33 PM
To: Steven S. Biss
Subject: RE: Flynn - CNN

Dear Steven

I am informed that the Complaint was served yesterday afternoon. Will you agree, in light of your representation below that you intend to amend the complaint within 21 days, that CNN will not be required to respond to the Complaint as served? If so, I propose to draft a letter to the Court informing the Court that you have informed CNN that plaintiffs intend to amend within 21 days and the parties have agreed that CNN is required to respond only to that amended complaint.

If we cannot agree, CNN will raise these issues with the Court.

Please let me know.

Thanks

Kate Bolger

From: Steven S. Biss <stevenbiss@earthlink.net>
Sent: Thursday, April 29, 2021 1:05 PM
To: Bolger, Kate <KateBolger@dwt.com>
Subject: Flynn - CNN

[EXTERNAL]

Kate,

I have completed a review of your letter and accompanying emails.

My clients intend to file an amended complaint within 21 days of service upon CNN. We believe the amended complaint will address the concerns in your letter.

I plan to have the summons and complaint served on CNN today or tomorrow.

You have no good faith basis to file any Rule 11 motion against the Flynns. They will not be intimidated, and will likely file a cross-motion under Rule 11 in the event that you proceed down that road.

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